

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY,)	
et al.,)	
)	
Plaintiffs,)	CIVIL ACTION NO.: 05-CV 11840-MLW
)	
v.)	
)	
AMERICAN INTERNATIONAL GROUP,)	
and TRENWICK AMERICA)	
REINSURANCE CORPORATION,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR LEAVE TO FILE CONSOLIDATED
BRIEF IN EXCESS OF TWENTY PAGES (ASSENTED TO BY ALL PARTIES)

Pursuant to Local District Court Rule 7.1, Plaintiffs move for leave to file a single, consolidated Reply Memorandum in Support of their Motion to Remand to the Superior Court that exceeds twenty (20) pages. This Motion is assented to by all other parties to the case. In support of this request, Plaintiffs state as follows:

1. On November 14, 2005, Defendants American International Group, Inc. ("AIG, Inc.") and Trenwick America Reinsurance Corporation ("Trenwick") filed and served their Oppositions to Plaintiffs' Motion for Remand.

2. In a Joint Motion filed on October 26, 2005 and amended by consent on November 10, 2005 and again on December 7, 2005, the Parties agreed that the Plaintiffs would have until December 14, 2005 to reply to Defendants' Oppositions to Remand. Under the provisions of Local District Court Rule 7.1, a reply brief to each of the Defendants' opposition motions could not exceed twenty (20) pages, or a total of forty (40) pages of briefing.

3. In order to streamline the briefing of these motions, Plaintiffs propose to file a single, consolidated Reply Memorandum in Support of their Motion to Remand. However, Plaintiffs cannot address all of the issues raised in both Defendants' Motions in Opposition within the twenty (20) pages granted as of right for a brief under Local District Rule 7.1. Plaintiffs do not anticipate that its

single, consolidated brief will exceed approximately thirty (30) pages in length, which is ten (10) pages less than Plaintiffs would otherwise be allowed for briefing.

4. In light of the complexity of the issues raised by Plaintiffs' Reply Memorandum in Support of their Motion to Remand, there is "good cause" for the court to permit Plaintiffs to file a brief in excess of twenty (20) pages. Further, in the interest of attempting to streamline the briefing of these issues, all parties have assented to this request.

For the reasons stated, Plaintiffs respectfully requests that the court grant it leave to file a single, consolidated Reply Memorandum in Support of their Motion to Remand that exceeds twenty (20) pages.

Respectfully submitted,

/s/ Steven L. Schreckinger
Steven L. Schreckinger (BBO #447100)
Lynch Brewer Hoffman & Fink LLP
101 Federal Street, 22nd Floor
Boston, MA 02199-7613
(617) 951-0800

Joseph T. McCullough IV
Robin C. Dusek
Lovells
One IBM Plaza
Suite 1900
Chicago, IL 60611
(312) 832-4400

Kathy L. McFarland
Lovells
900 Third Avenue
New York, NY 10022
(212) 909-0600

Dated: December 14, 2005

I hereby certify that I caused a true copy of the above document to be served on the attorney of record for each other party by electronic means on December 14, 2005.

/s/ Steven L. Schreckinger
Steven L. Schreckinger